

1
2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 Armacell LLC,

11 Plaintiff,

12 v.

13 Bailey Sales & Associates Inc.,

14 Defendant.
15

No. C19-506 RSM

STIPULATED MOTION AND ORDER
LIFTING DEADLINES AND SETTING
STATUS REPORT

16 **STIPULATION**

17 Plaintiff Armacell LLC (“Armacell”) and Defendant Bailey Sales & Associates Inc.
18 (“Bailey Sales”) are engaging in good faith settlement discussions scheduled to take place over
19 the next six weeks. To support those discussions, and in order to avoid litigation costs and
20 potentially unnecessary judicial resources, the parties agree and respectfully request that case
21 deadlines and pending motion practice be stayed during the period scheduled for settlement
22 discussions. Therefore, by this stipulated motion, the parties seek relief from the Order
23 Regarding Initial Disclosures and Joint Status Report (Dkt. 36), so that the deadlines therein can
24 be postponed until after the settlement discussion period, and thereby potentially avoided. The
25 parties further agree that Armacell’s motion to dismiss (Dkt. 46) should be taken off calendar for
26

STIPULATED MOTION AND ORDER LIFTING
DEADLINES AND SETTING STATUS REPORT
(No. 2:19-cv-00506-RSM) - 1

101928623.2 0070284-00001

STOEL RIVES LLP
ATTORNEYS
600 University Street, Suite 3600, Seattle, WA 98101
Telephone 206.624.0900

1 the June 7, 2019 note date, subject to re-notice in the future if settlement discussions are
2 unsuccessful.

3 To insure this matter remains active on the Court's docket and to avoid undue delay if
4 settlement discussions are not successful, the parties stipulate and agree to provide a status report
5 to the Court by no later than June 28, 2019.

6
7 DATED this 15th day of May, 2019.

8
9 SUMMIT LAW GROUP

10 s/ Philip McCune

11 Philip S. McCune, WSBA No. 21081
12 315 5th Ave. S., Suite 1000
13 Seattle, WA 98104
14 Telephone: 206-676-7038
15 philm@summitlaw.com

16 Pressly M. Millen, *pro hac vice*
17 Samuel B. Hartzell, *pro hac vice*
18 WOMBLE BOND DICKINSON LLP
19 555 Fayetteville St., Suite 1100
20 Raleigh, NC 27601
21 Telephone: 919-755-2135
22 press.millen@wbd-us.com

23 *Attorneys for Plaintiff Armacell LLC*

24 STOEL RIVES LLP

25 s/ Vanessa Power

26 Vanessa Soriano Power, WSBA No. 030777
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206-624-0900
vanessa.power@stoel.com

Daniel E. Beederman, *pro hac vice*
Matthew P. Tyrrell, *pro hac vice*
SCHOENBERG FINKEL NEWMAN &
ROSENBERG LLC
222 South Riverside Plaza, Suite 2100
Chicago, IL 60606
Telephone: 312-648-2300
daniel.beederman@sfnr.com
matthew.tyrrell@sfnr.com

*Attorneys for Defendant Bailey Sales &
Associates Inc.*

1 **ORDER**

2 The Stipulated Motion is **GRANTED**. The parties shall file a status report with the
3 Court by June 28, 2019.

4 DATED this 16th day of May 2019.

5 

6 RICARDO S. MARTINEZ
7 CHIEF UNITED STATES DISTRICT JUDGE
8
9

10 Presented by:

11
12 SUMMIT LAW GROUP

13 s/ Philip McCune

14 Philip S. McCune, WSBA No. 21081
15 315 5th Ave. S., Suite 1000
16 Seattle, WA 98104
17 Telephone: 206-676-7038
philm@summitlaw.com

18 Pressly M. Millen, *pro hac vice*
19 Samuel B. Hartzell, *pro hac vice*
20 WOMBLE BOND DICKINSON LLP
21 555 Fayetteville St., Suite 1100
22 Raleigh, NC 27601
23 Telephone: 919-755-2135
press.millen@wbd-us.com

24 *Attorneys for Plaintiff Armacell LLC*

25 STOEL RIVES LLP

26 s/ Vanessa Power

Vanessa Soriano Power, WSBA No. 030777
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206-624-0900
vanessa.power@stoel.com

Daniel E. Beederman, *pro hac vice*
Matthew P. Tyrrell, *pro hac vice*
SCHOENBERG FINKEL NEWMAN &
ROSENBERG LLC
222 South Riverside Plaza, Suite 2100
Chicago, IL 60606
Telephone: 312-648-2300
daniel.beederman@sfnr.com
matthew.tyrrell@sfnr.com

*Attorneys for Defendant Bailey Sales &
Associates Inc.*